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April 14, 1998

NOTICE OF EX PARTE PRESENTATION

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RECEIVED

APR 14 1998

Re: *In the Matters of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121 and Request by ALTS for Clarification of the Commission's Rules Regarding Reciprocal Compensation for Information Service Provider Traffic, CCB/CPD No. 97-30*

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Please be advised that yesterday I met with Chairman William E. Kennard, his chief of staff, John Nakahata, and his legal advisor, Tom Power, in connection with the above-referenced proceedings. The purpose of the meeting was to provide the Chairman, Mr. Nakahata, and Mr. Power with a status report regarding SBC's meetings on section 271 competitive checklist compliance with the Common Carrier Bureau staff. In addition, I provided the attached document concerning reciprocal compensation involving Internet service providers and competitive local exchange carriers.

Should you have any questions concerning the foregoing, do not hesitate to contact me. In accordance with the Commission's rules, an original and one copy of this notification are submitted herewith.

Very truly yours,

Dale Robertson

Attachments

cc: Chairman Kennard (w/o attachments)
Mr. Nakahata (w/o attachments)
Mr. Power (w/o attachments)

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ENCLOSURE

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STATUS REPORT

***Dialogue with Common Carrier Bureau Staff
Concerning Competitive Checklist Compliance***



SBC Communications Inc.

PLANNED PRE-FILING MEETING SCHEDULE FOR 271 ISSUES

| DATE | MEETING TOPIC | LEAD SBC SME | CCB Policy Division | CCB Pricing Division | CCB Accounting Division | OGC Competition Division | Legal Advisers | GC/FCC | COMMENTS |
|-------------------|---|--|---------------------|----------------------|-------------------------|--------------------------|----------------|--------|---|
| January 23, 1998 | "Non-Controversial" Issues I | Bill Deere/Bill Adair | ✓ | | | | | | Number Administration, Dialing Parity, & Access to E-911 |
| January 28, 1998 | "Non-Controversial" Issues II | Rhonda Dickherber & Richard Keener | ✓ | | | | | | White Pages, Directory Assistance & Operator Services |
| February 4, 1998 | Poles, Ducts & Conduits and Interconnection (Section 271(c)(2)(B)(i)) | Jim Hearst & Bill Deere | ✓ | | | | | | Interconnection Trunks |
| February 11, 1998 | Loops, Local Transport, and Local Switching | Bill Deere | ✓ | | | | | | Sections 271(c)(2)(B)(iv) – (vi) |
| February 25, 1998 | Databases & Signalling Systems and Number Portability | Dave Clippard (DB), Bill Deere (SS), Curt Hopfinger (INP), Gary Fleming (SWBT-LNP) & Sally Swan (PB-LNP) | ✓ | | | | | | Section 271(c)(2)(B)(xi) |
| March 5, 1998 | OSS Interfaces/Functions | Liz Ham | ✓ | | | | | | 10:30 a.m.-12:30 p.m.; Including System Capacity & Scalability, Testing, and Billing Issues |
| March 18, 1998 | OSS Interfaces/Functions and Performance Measurements | Liz Ham & Randy Dysart | ✓ | | | | | | |
| March 23, 1998 | STAFF FEEDBACK: Groups 1 & 2 Issues | Marty Grambow & Paul Mancini | ✓ | | | | | | |
| April 9, 1998 | Access to UNEs & UNE Combinations | Bill Deere, Mike Auinbauh, Curt Hopfinger | ✓ | | | ✓ | | | Access to UNEs and Access to combinations of network elements |
| April , 1998 | (1) Reciprocal Compensation and (2) Resale | Mike Auinbauh, Curt Hopfinger, Ed Allis, Charlie Cleek | ✓ | | | | | | Section 271(c)(2)(B)(xiii) and (xiv) |
| April , 1998 | Track A/Track B and Sec 272 Compliance | Austin Schlick (A/B), John Lube, Lee Jones, Kathy Rehmer, Kathleen Larkin | ✓ | | ✓ | ✓ | | | Section 271(c)(1)(A) and (B) |
| April , 1998 | Co-location: Terms & Conditions/Pricing | Mike Auinbauh, Curt Hopfinger, Carol Burdine | ✓ | | | ✓ | | | |
| | Overview of FCC 271 Application | Zeke Robertson | ✓ | | | ✓ | ✓ | ✓ | |

SBC'S SUCCESS IN OPENING ITS LOCAL MARKETS: SIGNIFICANT LOCAL COMPETITION EXISTS AND IS GROWING

March 1998 Report

SBC (Southwestern Bell Telephone, Pacific Bell and Nevada Bell) has dedicated significant resources and investment to open its markets to local competition and to comply with all requirements contained in the 1996 Telecommunications Act. As described in detail below, SBC has made available products, services and systems required by Section 251 and the competitive checklist of the 1996 Act, and competitive local exchange carriers ("CLECs") have ordered and are actually using these checklist services and products to provide local service in all seven SBC states.

These indicators provide irrefutable evidence that new entrants are obtaining the network elements that they need from SBC to provide local service, that they are providing such exchange services to end users and that their ability to enter the market is unambiguous. Taken together, these data demonstrate that entry requirements into the local market in SBC's states have been eliminated, that competitive entry is occurring and that SBC has lost more than **837,000** lines to CLECs in SBC's states. As a result of SBC's compliance efforts, CLECs now have everything they need to compete against SBC and can use resale, interconnection or unbundled network elements to compete for and take SBC customers.

SBC's Capital and Expense Investments To Open Its Markets

- Since the passage of the 1996 Act on February 6, 1996, SBC has devoted significant financial, technical and personnel resources to implement the market- and network-opening requirements of Sections 251 and 252 of the Act. SBC has spent more than \$1 billion and devoted more than 3,300 employees to implement the Act and open its local markets to competition— including but not limited to equipment, computer hardware, software and manpower. By the end of 1998, SBC estimates that it will have spent a total of \$1.5 billion making certain it meets the requirements of the Act.

Interconnection Agreements

- Signed Agreements: SBC and CLECs have signed 280 interconnection and resale agreements within SBC's seven-state service area.
- PUC Approved Agreements: The various state commissions have approved 214 SBC-CLEC interconnection and resale agreements. These approved agreements give the CLECs everything they say they need to provide local services and compete against SBC. There are a large number of PUC approved agreements in each of SBC's states: Texas: 88; California: 27; Kansas: 24; Arkansas: 21; Oklahoma: 19; Missouri: 22 and Nevada: 13 approved agreements.
- Current Negotiations: SBC currently is in the process of negotiating more than 400 additional interconnection and resale agreements.

CLECs Competing Against SBC

- As of the end of February 1998, more than 165 CLECs were operational in SBC's territory and passing resale, interconnection or UNE orders to SBC. Ninety CLECs were passing orders in Texas alone.

SBC Access Lines Lost to CLECs

- Through the end of February 1998, more than **830,000** access lines have been lost to CLECs through resale or through the establishment of new facilities-based service by CLECs in SBC's seven-state service area. Over 575,000 SBC lines have been resold by CLECs and more than 260,000 additional customers are being served on a facilities-basis by CLECs in SBC's territory.
- The approximate number of lines lost to CLECs in SBC's 7 states on a resale and facilities-basis is:

| | <u>Resale Total</u> | <u>Resale Residential</u> | <u>Resale Business</u> | <u>Resale Priv. Coin</u> |
|----------------------|-------------------------|-------------------------------|----------------------------|------------------------------|
| a) California: | 259,000 | 145,000 | 107,000 | 6,900 |
| b) Texas: | 244,000 | 186,000 | 46,000 | 11,000 |
| c) Kansas: | 35,800 | 17,100 | 18,600 | 0 |
| d) Oklahoma: | 13,300 | 11,100 | 2,200 | 13 |
| e) Arkansas: | 11,994 | 10,600 | 1,300 | 0 |
| f) Missouri | 9,000 | 4,000 | 4,900 | 0 |
| g) Nevada | 3,400 | 699 | 2,700 | 0 |
| RESOLD LINES: | 576,300 | 375,300 | 182,700 | 18,300 |

FACIL.-BASED

LINES LOST: 261,220

SBC TOTAL

LINES LOST: 837,500

- Resale activity is significant and growing in SBC's territory. SBC has demonstrated that its OSS can process CLEC resale orders in an accurate and timely manner without any backlogs. Resale activity (approximately 32,500 lines lost) stabilized in February, 1998, and this situation was primarily the result of decisions by AT&T and MCI to de-emphasize their residential resale activities. Nevertheless, even if the major IXCs chose for their own internal business reasons not to take advantage of the residential resale option made available to them by SBC because they do like the resale pricing decisions made by the PUCs, there can be no dispute that SBC has met

its obligations under the Act to make resale available to competitors. The figures listed above demonstrate that SBC has made available to CLECs all the systems and services they need to compete on a resale basis in each of SBC's states.

FACILITIES-BASED COMPETITION STATUS:

The following figures demonstrate that SBC has opened its local markets to competition and that SBC is providing CLECs with the facilities and network elements they request from SBC in order to compete on a facilities-basis in the local exchange market. Information is not available to SBC to identify with precise the full extent of facilities-based competition in each of its states. Available indicators underestimate the extent of facilities-based competition and are imperfect measures of competitive entry because each captures only that part of entry that requires action by SBC and does not capture the extent of facilities-based self-supply being undertaken by CLECs. Nevertheless, a review of CLEC E-911 listings and numbers ported demonstrates that there is significant and growing facilities-based competition in SBC's states and that more than **260,000** lines are being served on a facilities-basis by CLECs in SBC's states.

- SBC is making available to CLECs through 214 PUC-approved interconnection agreements and its new and modified systems and networks, all products, services and systems that CLECs need to provide facilities-based or UNE-based local service to residential and business customers.

CLEC E-911 Numbers—First Indicator of Facilities-Based Competition

- CLEC listings in the E-911 database is one indicator of access lines being served on a facilities basis by facilities-based carriers. These listings show that CLECs serve at least 261,000 lines in SBC's 7 states on a facilities basis. CLECs have requested E-911 service for more than 261,000 lines from their own NXX Codes that were assigned to them to provide facilities-based service.
- In California alone, 14 facilities-based carriers serve more than 243,000 lines on a facilities basis, based on E-911 listings. CLEC E-911 listings indicate that there is at least the following number of lines being served on a facilities-basis in the other SBC states: Texas: 2,250; Oklahoma: 11,802; Missouri: 1,657; Arkansas: 1,400; and Kansas: 1,111 facilities-based lines.

Numbers Ported—Second Indicator of Facilities-Based Competition

- More than 44,600 existing SBC lines have been ported via interim number portability to facilities-based competitors. This is one indicator of facilities-based competition that has occurred in SBC's seven states, but it underestimates the actual amount of facilities-based competition that has occurred. Each of the numbers ported represents conversion of an existing line from SBC to a facilities-based CLEC provider. It should be noted, however, that lines do not have to be ported when CLECs serve new lines/customers on a facilities-basis and that SBC has no precise method for determining exactly how many additional lines or customers are being served by facilities-based providers in its seven states.

UNEs, Interconnection and Other Facilities-Based Products Provided By SBC to CLECs

- Interconnection Trunks: SBC's provisioning of local interconnection trunks is an indicator that actual local exchange traffic is being exchanged between CLECs and SBC. SBC has provisioned more than 216,000 one-and two-way interconnection trunks to CLECs in SBC's seven-state service area. These trunks allow CLECs to connect their networks and customers to SWBT's network. 128,000 of these trunks were provisioned in California and 86,000 interconnection trunks were provided to CLECs in the SWBT five-state region.
- Unbundled Loops: Unbundled loops are the direct connection between the local network and customer's premises. CLECs can provision loops themselves, or they can lease unbundled loops from SBC or other suppliers. Because CLECs can self-provision loops, the number of unbundled loops provided by SBC understates the extent of existing facilities-based competition. Nevertheless, more than 41,000 unbundled loops have been provisioned by SBC to CLECs in SBC's seven states. In addition, more than 270 unbundled switch ports have been requested by and provided to CLECs by SBC.
- CLEC Collocation Arrangements: Collocation is an important measure of competitive facilities-based presence because once a competitor is collocated in an SBC central office it has access to every loop connected to that central office. More than 285 physical collocation arrangements are operational in SBC's seven-state service area -- 54 of these are in SWBT's region, with 219 in California/ Nevada.
- 250 physical collocation arrangements (78 in SWBT and 143 in California/Nevada) are currently being worked on and pending completion.
- More than 50 virtual collocation arrangements are operational in SWBT's five-state territory, with an additional 6 virtual collocation arrangements pending completion.
- CLEC Switches: CLECs have installed more than 360 switches in SBC's states. In California, CLECs have 212 local switches, which is equal to 25 percent of the switches PacBell currently has in operation. In the SWBT states, there are 155 CLEC local switches.
- E-911 Trunks: CLECs have requested and SBC has provisioned 526 operational E-911 trunks to CLECs in SBC's seven-state service area. Of this number, 372 are located in California and about 152 are in SWBT states.
- DA/OS Trunks: More than 700 Directory/Operator Assistance trunks have been provisioned by SWBT to CLECs in the five SWBT states.

Reciprocal Compensation – Another Indicator That SBC's Networks Are Open

- Reciprocal compensation minutes of use is another indicator that demonstrates that actual local traffic is being exchanged between CLECs and SBC. A substantial amount of traffic has been exchanged between SBC and CLECs, with most of that

traffic (and the corresponding reciprocal compensation) going from SBC to the CLECs. For example, more than **3.3 billion** minutes of local traffic (excluding Internet traffic) has been exchanged between SWBT/Pacific Bell/Nevada Bell and CLECs over interconnection trunks. More than 90% of this local traffic has been exchanged from SBC to CLEC networks. It should be noted, that these minutes do not capture all local minutes being generated by CLECs because they do not include CLEC-to-CLEC traffic or on-net (i.e., intra-CLEC) traffic.

- In addition, the fact that an additional **3.7 billion** minutes of Internet traffic has been exchanged between SBC and CLEC networks also demonstrates that SBC's networks have been opened to competition. These minutes-of-use numbers confirm that SBC's networks are open to and connect with CLEC networks.

Telephone Numbers Requested By and Assigned to CLECs

- More than 1,922 NXX codes (each code representing 10,000 numbers) have been assigned to CLECs in SBC's seven-state service area, with an additional 120 assignments pending. In other words, CLECs have requested and SBC has assigned 19.2 million telephone numbers to CLECs in its seven states; more than 10.9 million numbers have been requested by CLECs in California and an additional 8.2 million numbers have been requested in SWBT's five states.

Access to SBC White Page Directories

- CLEC information can be included in all White Page directories in SBC's seven state service areas. SBC has provided more than 417,000 white page listings for CLEC customers.

Access to SBC Poles and Conduits

- SBC has provided competitors with access to more than 373,000 of its poles and approximately 7.5 million feet of conduit space for their use to compete against SBC in its seven states.

CLEC Orders Handled by SBC's OSS and Local Service Centers

- Since the 1996 Act passed, SBC's OSS and Local Service Center personnel have handled more than 1.5 million service orders from CLECs to order facilities, network elements and resold or second lines for their customers, change or add vertical services etc. Almost 1 million orders from CLECs have been processed in the SWBT five-state region and more than 560,000 orders have been processed in California/Nevada. The fact that SWBT processed more than 730,000 orders in 1997, and an additional 135,000 orders in February 1998 alone, without a backlog, is strong evidence that SBC has developed state-of-the-art OSS and that these systems are being used by CLECs to compete in the local market against SWBT. Orders are also being processed in California in a similar timely and accurate manner without any backlogs.
- SBC also demonstrated in Texas that its OSS (which is the same system used in all five SWBT states) could handle large increases in volumes from CLECs. Over

843,000 CLEC service orders in Texas have been processed, with over 105,000 orders processed in February 1998 alone. SBC's OSS and Local Service Centers have handled the increased volume of service orders without experiencing a backlog.

Conclusion

- The resale, interconnection, facilities-based and OSS-related numbers listed above, provide strong and compelling evidence that SBC has opened each of its seven states to resale, facilities-based and UNE competition and that SBC provides CLECs with all the systems and services they need to capture SBC's local customers.
- A neutral examination of the record unequivocally confirms that SBC has complied with the 1996 Act and has opened its local markets to competition.

SBC's Section 251 Checklist Provisioning Status

☒ End of Month Report
☐ Mid-Month Update
Data through 2/98 (unless otherwise noted)
Shaded data through 1/98 (unless otherwise noted)
Green, italicized, bolded data is corrected from previous edition

Report Date 3/21/98

| # | CHECKLIST DESCRIPTION | PRODUCTS PROVIDED | AR | KS | MO | OK | TX | SWBT's 5 States | CA | NV | SBC TOTAL |
|----|---|--|--|--|--|--|--|--|--|--|---|
| 1 | Interconnection for the transmission and routing of telephone exchange service and exchange access at any technically feasible point within the carrier's network | Total Trunks Trunks Provided to CLECs One Way Trunks (SBC to CLEC) One Way Trunks (CLEC to SBC) Two Way Trunks Physical Collocation Operational Cages Pending Cages Virtual Collocation Operational Arrangements Pending Arrangements Number of Collocated Wire Centers (Note 1) | 3 790 2 360 572 858 6 2 2 0 3 | 2 208 1 056 348 804 3 5 6 0 4 | 6 367 4 156 1 431 780 6 24 8 0 7 | 8 106 6 369 1 185 552 14 5 3 2 11 | 66 122 38 966 15 795 11 361 36 70 35 4 29 | 86 593 52 907 19 331 14 355 65 106 54 6 54 | 128 386 12 504 1 560 114 322 219 143 0 2 94 | 1 477 0 0 1 477 3 1 0 0 3 | 216 456 65 411 20 891 130 154 287 250 0 0 151 |
| 2 | Nondiscriminatory access to network elements (In addition: See Items 3 & 6 below) | Number of CLECs passing orders in 1998 Total orders processed (2/6/96 - 2/98) * Manual Electronic Total orders processed in 1997 * Manual Electronic Total orders processed in 1998 * Manual Electronic Total orders processed in February 1998 * Manual Electronic | 10 36 393 36 393 0 19 035 19 035 0 17 358 17 358 0 11 633 11 633 0 | 10 56 835 40 287 16 548 41 476 28 972 12 504 15 359 11 315 4 044 8 106 6 194 1 912 | 15 12 329 12 136 193 6 396 6 309 87 5 929 5 823 106 4 011 3 937 74 | 11 36 275 32 389 3 886 22 832 20 408 2 424 13 439 11 977 1 462 7 109 6 238 871 | 90 843 562 657 567 185 995 641 098 495 077 146 021 160 860 120 886 39 974 74 826 56 420 18 406 | 136 985 394 778 772 206 622 730 837 569 801 161 036 212 945 167 359 45 586 105 685 84 422 21 263 | 26 560 524 100% in 1996 0% in 1996 491 327 ~ 80% ~ 20% 68 936 ~ 80% ~ 20% 28 364 ~ 80% ~ 20% | 4 3 511 0 3 511 0 0 1 429 1 429 0 884 884 0 | 166 1 549 429 0 1 225 674 0 0 283 310 0 134 934 |
| 3 | Nondiscriminatory access to poles, ducts, conduits and rights of way | Total Number of Poles Attached (Note 2) Total Feet of Duct Occupied (Note 2) | 112 71 996 | 22 6 149 | 415 61 600 | 186 34 761 | 2 080 113 977 | 2 815 288 483 | 370 060 7 236 650 | 508 16 225 | 373 385 7 541 358 |
| 4 | Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services | Unbundled Loops | 185 | 176 | 450 | 459 | 199 | 1 469 | 33 891 | 5 729 | 41 089 |
| 5 | Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services | Unbundled Transport Dedicated Transport Available? Shared Transport Available? | Yes Yes | Yes Yes | Yes Yes | Yes Yes | Yes Yes | Yes Yes | Yes Yes | Yes Yes | Yes Yes |
| 6 | Local switching unbundled from transport, local loop transmission or other services | Unbundled Switch Ports | 0 | 0 | 0 | 0 | 172 | 172 | 100 | 0 | 272 |
| 7 | Nondiscriminatory access to 911 and E911, directory assistance, and operator call completion services | E911 Trunks (not included in Item 1 Total) DA/OA Trunks (not included in Item 1 Total) CLECs using Directory Assistance Service (Note 3 & Special Note 3) CLECs using "0" Call Completion Service (Note 3 & Special Note 3) Are CLECs offered E-911 service directly to government bodies or interconnecting with SBC's existing service arrangements? | 16 64 7 7 Yes | 16 0 9 9 Yes | 11 78 12 12 Yes | 18 64 9 9 Yes | 91 498 83 83 Yes | 152 704 93 93 Yes | 372 0 Data Not Available Data Not Available Yes | 2 18 Data Not Available Data Not Available Yes | 526 722 0 0 Yes |
| 8 | White pages directory listing for customers of other carrier's telephone exchange service | Number of CLEC End User White Pages listings Resale Facilities Based Total | 11 010 162 11 172 | 23 303 55 23 358 | 5 285 96 5 381 | 11 429 89 11 518 | 166 425 2 199 168 624 | 217 452 2 601 220 053 | 188 212 7 779 195 991 | 1 142 547 1 689 | 406 806 10 927 417 733 |
| 9 | Nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers (Note 4) | Telephone Numbers Provided to CLECs Numbers Assigned Numbers Pending Assignment | 120 000 0 | 70 000 0 | 680 000 0 | 330 000 0 | 7 010 000 30 000 | 8 210 000 30 000 | 10 980 000 90 000 | 30 000 0 | 19 220 000 120 000 |
| 10 | Nondiscriminatory access to databases and associated signaling necessary for call routing and completion | Access to 800, Line Information Database (LIDB), Calling Name Delivery Database (CNAM), and SS7 Signaling Network Available? | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |

SBC's Section 251 Checklist Provisioning Status

- ☒ End of Month Report
☐ Mid-Month Update
☐ Data through 2/98 (unless otherwise noted)
☐ Shaded data through 1/98 (unless otherwise noted)

Report Date 3/21/98

Green, italicized, bolded data is corrected from previous edition.

| # | CHECKLIST DESCRIPTION | PRODUCTS PROVIDED | AR | KS | MO | OK | TX | SWBT's 5 States | CA | NV | SBC TOTAL |
|----|--|---|---|---|---|---|---|---|--|---|--|
| 11 | Interim number portability through RCF or DID trunks. Each line ported represents conversion of an existing line from SBC to a facilities based provider | Lines Converted via INP Residential Lines Business Lines Total | 0 987 987 | 0 409 409 | 0 452 452 | 0 6,959 6,959 | 37 8,138 8,175 | 37 16,945 16,982 | 1,148 18,191 19,339 | 0 8,286 8,286 | 1,185 43,422 44,607 |
| 12 | Nondiscriminatory access to services and information required to allow implementation of dialing parity | Are additional access codes or digits needed to complete local calls to or from CLEC customers? IntraLATA toll dialing parity available concurrent with SBC's provision of interexchange service? | No Yes | No Yes | No Yes | No Yes | No Yes | No Yes | No Yes | No Yes | No Yes |
| 13 | Reciprocal compensation arrangements (Note 5) | Minutes of Use Exchanged Over Interconnection Trunks in 1997 (in Millions) From SBC to CLEC From CLEC to SBC Total Minutes of Use Exchanged Over Interconnection Trunks in 1998 (in Millions) From SBC to CLEC From CLEC to SBC Total Minutes of Use Exchanged Over Interconnection Trunks in February 1998 From SBC to CLEC From CLEC to SBC Total | 27.7 6.6 34.3 7.4 0.0 7.4 3,468,466 9,238 3,477,704 | 0.0 0.0 0.0 0.0 0.0 0.0 0 0 0 | 13.2 0.0 13.2 10.4 0.0 10.4 4,926,410 0 4,926,410 | 83.9 4.0 87.9 20.8 5.4 26.2 11,126,695 2,713,294 13,839,989 | 118.6 49.1 167.7 60.7 78.3 138.9 24,316,475 30,767,591 55,084,066 | 243.4 59.7 303.1 99.2 83.7 182.9 43,838,046 33,490,123 77,328,169 | 2,549.4 284.6 2,834.0 Data Not Available Data Not Available Data Not Available 106,792 6,912 258,767 | 0.1 0.0 0.1 0 0 0 2,744 0 3,443 | 2,792.9 344.3 3,137.2 99.2 83.7 182.9 43,838,046 33,490,123 77,328,169 |
| 14 | Offering for resale at wholesale prices any telecommunications services offered at retail to subscribers who are not themselves carriers | Resold Access Lines Business Lines (Simple and Complex) Private Coin Lines Residential Lines Total | 1,306 0 10,688 11,994 | 18,654 0 17,146 35,800 | 4,932 0 4,098 9,030 | 2,235 13 11,140 13,388 | 46,061 11,386 186,492 243,939 | 73,188 11,399 229,564 314,151 | 106,792 6,912 145,063 258,767 | 2,744 0 699 3,443 | 182,724 18,311 375,326 576,361 |

Note 1: CA collocated wired centers total reflects physical arrangements only

Note 2: CA and NV data updated quarterly

Note 3: SWBT total counts each CLEC once, although it may appear in multiple states

Special Note 3: January report counted CLECs operating within a state as both a reseller and facilities based provider as two CLECs. This report counts the CLEC only once

Note 4: Each NXX Code equals 10,000 telephone numbers

Note 5: Totals do not include disputed Internet minutes of use. However, the fact that over 3.712B minutes of Internet traffic have been exchanged between SBC and CLEC networks in 1997 and 1998 also demonstrates that SBC's networks have been opened to competition. 1997 totals include Local, Optional EAS, and intraLATA toll MOU. 1998 numbers include only Local and Optional EAS traffic.

* CA Order Volumes include Resale activity only. All others include Resale and Facilities Based orders

** KS does have OA/DA trunks. In process of splitting those OA/DA trunks terminating and counted in KC, MO that serve both KS and MO

| CLECs with Certifications | | AR | KS | MO | OK | TX | SWBT's 5 States | CA | NV | SBC TOTAL |
|--|------------------------------------|----|----|----|----|-----|--------------------|-----|----|-----------|
| | Number Approved | 17 | 43 | 36 | 33 | 149 | 278 | 116 | 52 | 446 |
| | Number Pending | 23 | 12 | 13 | 13 | 20 | 81 | 28 | 8 | 117 |
| CLEC Interconnection Agreements (as of 3/20/98) | | | | | | | | | | |
| | Number Signed | 27 | 34 | 34 | 33 | 109 | 237 | 30 | 13 | 280 |
| | Number Approved | 21 | 24 | 22 | 19 | 88 | 174 | 27 | 13 | 214 |
| | Number of Arbitrations Completed | 0 | 3 | 3 | 1 | 11 | 18 | 4 | 0 | 22 |
| | Number of Arbitrations In Progress | 1 | 0 | 0 | 0 | 1 | 2 | 0 | 1 | 3 |
| | Number Under Negotiation | 52 | 50 | 58 | 55 | 130 | 345 | 35 | 22 | 402 |

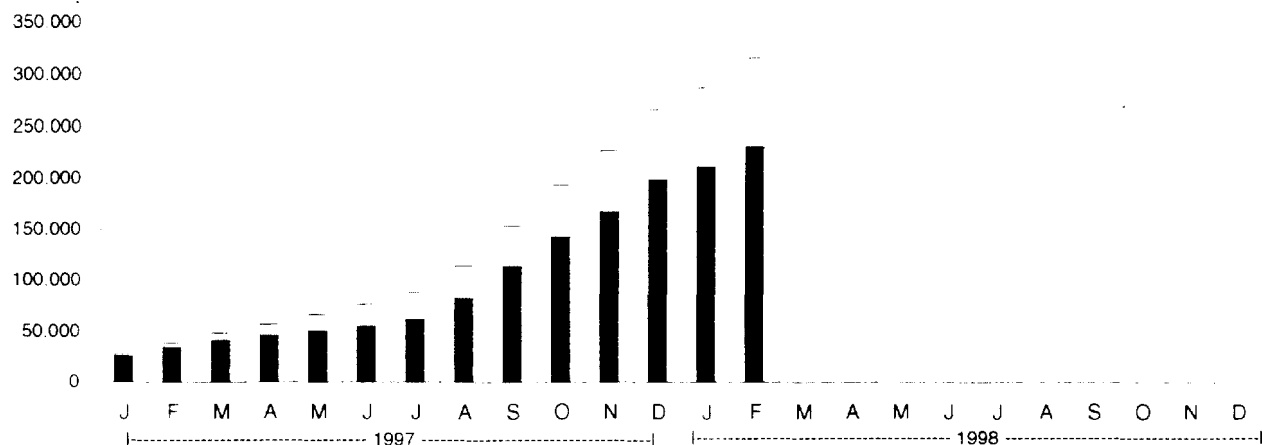
Competition

SBC meets the 14 point competitive checklist

- ☒ **Interconnection**
 - » 214 Approved Agreements
- ☒ **Unbundled Network Element Access**
 - » 56,100 UNE elements purchased
- ☒ **Nondiscriminatory Access to Outside Plant**
 - » 7.5 million duct feet occupied
 - » 373 thousand pole attachments
- ☒ **Unbundled Local Loops**
 - » 41,089 loops purchased
- ☒ **Unbundled Local Transport**
 - » 341 Collocation Instances
- ☒ **Unbundled Local Switching**
 - 272 Switch Ports
- ☒ **Nondiscriminatory Access to 911, Directory Assistance and Call Completion Services**
 - » 526 E911 Trunks
 - 722 DA/OA Trunks
- ☒ **White Pages Directory Listings**
 - » 417,733 listings
- ☒ **Nondiscriminatory Access to Number assignment**
 - » 1,922 NXX codes assigned/opened
 - » 12 NXX codes pending
 - » Ability to serve 19+ million lines
- ☒ **Nondiscriminatory access to Signaling and Databases**
- ☒ **Number Portability**
 - » 44,607 INP Lines Converted
- ☒ **Dialing Parity**
- ☒ **Reciprocal Compensation**
 - » 3.1 Billion MOUs exchanged in 1997 (excludes internet MOUs)
- ☒ **Resale**
 - » 563 CLECs have filed, 446 certified
 - » 166 CLECs sending orders in 1998
 - » 576,361 access lines

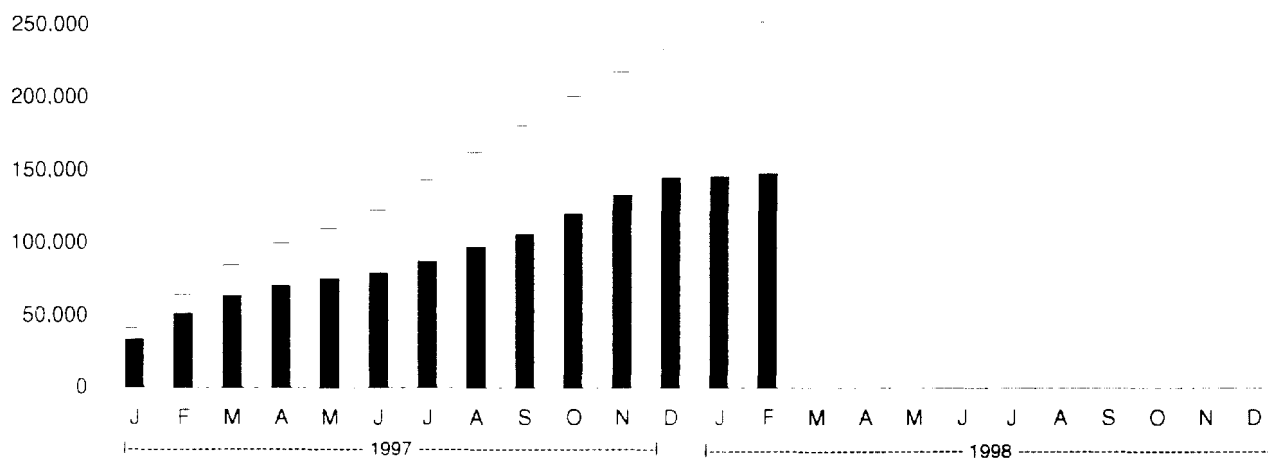
SBC Resold Lines - Cumulative Resale Lines Lost to CLECs

Southwestern Bell Telephone



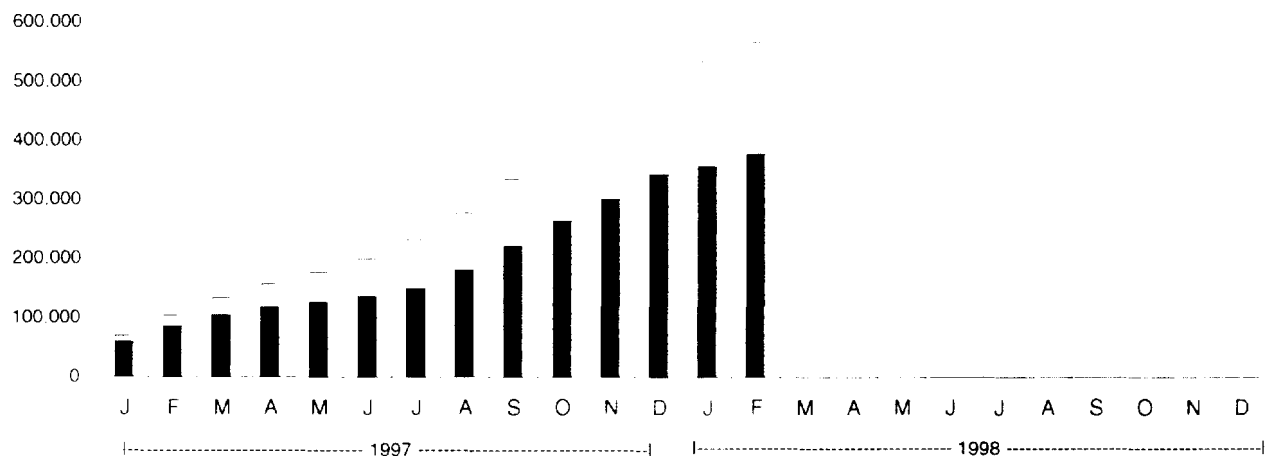
Business Residence

Pacific Bell



Business Residence

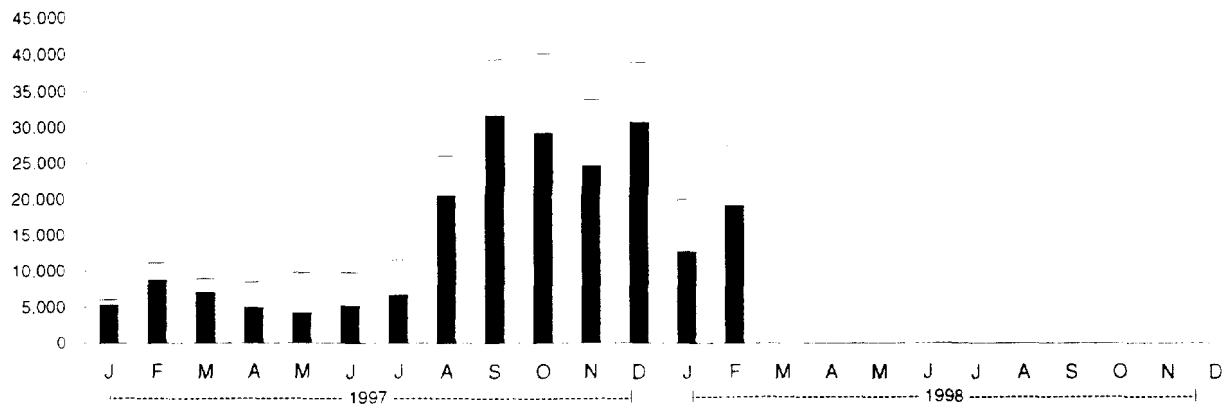
SBC Consolidated



Business Residence

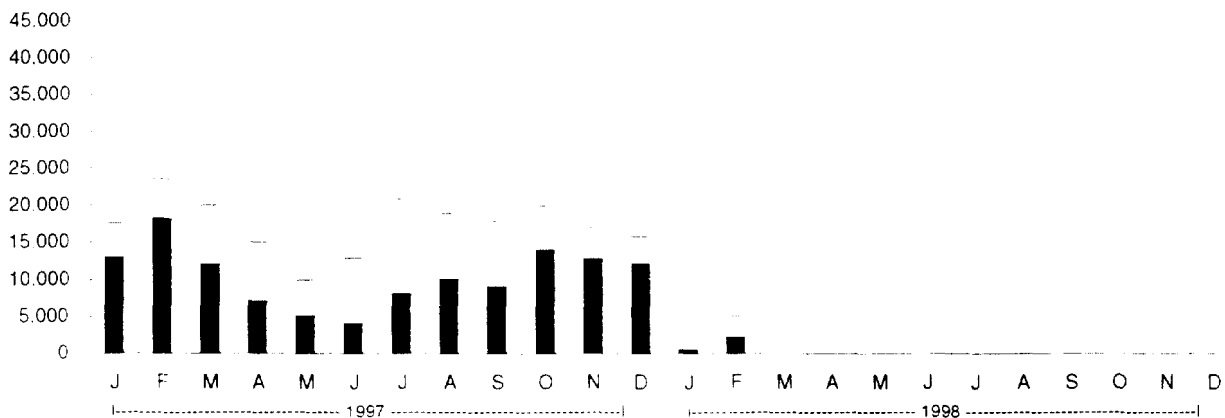
SBC Resold Lines - Monthly Resale Lines Lost to CLECs

Southwestern Bell Telephone



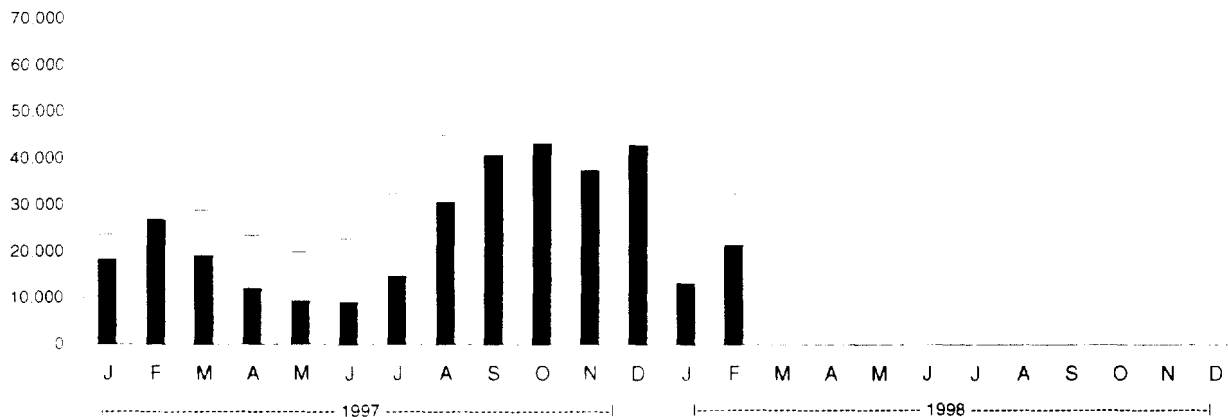
Business Residence

Pacific Bell



Business Residence

SBC Consolidated



Business Residence

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| 1 | INTERCONNECTION (Checklist Item (i)) | |
| 1.1 | For transmission and routing of exchange and exchange access service (Act. § 251 (c)(2)(A); 47 CFR § 51.305(a)(1)) | Deere Affidavit, ¶ 9 |
| 1.2 | At any technically feasible point (Act. § 251 (c)(2)(B); 47 CFR § 51.305(a)(2)), including: | Deere Affidavit, ¶¶ 9, 58 |
| 1.2.1 | Line side of local switch (47 CFR § 51.305(a)(2)(i)) | Deere Affidavit, ¶ 14 |
| 1.2.2 | Trunk side of local switch (47 CFR § 51.305(a)(2)(ii)) | Auinbauh Affidavit, Schedule 4 Deere Affidavit, ¶¶ 13, 29-39 |
| 1.2.3 | Trunk interconnection points of a tandem (47 CFR § 51.305(a)(2)(iii)) | Deere Affidavit, ¶ 13 |
| 1.2.4 | Central office cross-connect points (47 CFR § 51.305(a)(2)(iv)) | Deere Affidavit, ¶ 13 |
| 1.2.5 | Out-of-band signaling transfer points necessary to exchange traffic and access call-related databases (47 CFR § 51.305(a)(2)(v)) | Deere Affidavit, ¶ 13 |
| 1.2.6 | Points of access to unbundled network elements (47 CFR § 51.305(a)(2)(vi)) | Deere Affidavit, ¶ 13 |
| 1.3 | Two-way trunking upon request and as technically feasible (47 CFR § 51.305(f)) | Deere Affidavit, ¶ 31 |
| 1.4 | Through any technically feasible interconnection method, including (47 CFR § 51.321(a), (b)) | Deere Affidavit, ¶¶ 9-14 |
| 1.4.1 | Physical and virtual collocation (Act. § 251(c)(6); 47 CFR § 51.321(b)(1)) | Auinbauh Affidavit, ¶¶ 15-35, 41-45; Schedules 4-6 Deere Affidavit, ¶¶ 15, 18, 23 |
| 1.4.1.1 | For any type of equipment used for interconnection or access to unbundled network elements, including optical terminating equipment and multiplexers and equipment being collocated to terminate basic transmission facilities (47 CFR §§ 51.323(b), 51.323(b)(1)) | Deere Affidavit, ¶¶ 11-12, 16 |
| 1.4.1.2 | Interconnection point or points accessible to both SBC and the competing LEC as close as possible to SBC's premises (47 CFR § 51.323(d)(1)) | Deere Affidavit, ¶¶ 10-14, 19 |

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| 1.4.1.3 | At least 2 interconnection points where there are at least 2 entry points at which space is available for new facilities (47 CFR § 51.323(d)(2)) | Deere Affidavit, ¶ 19 |
| 1.4.1.4 | Allow interconnection of copper or coaxial cable if approved by the state (47 CFR 51.323(d)(2)) | Deere Affidavit, ¶¶ 9, 15 |
| 1.4.1.5 | Allow physical collocation of microwave facilities where technically feasible, or virtual collocation if physical collocation is not technically feasible (47 CFR § 51.323(d)(4)) | Deere Affidavit, ¶¶ 15, 18, 23 |
| 1.4.1.6 | For virtual collocation, install, maintain, and repair collocated equipment in same manner as SWBT's own equipment (47 CFR § 51.323(e)) | Auinbauh Affidavit, ¶¶ 41-45 Deere Affidavit, ¶¶ 18-20, 23, 26 Kramer Affidavit ¶¶ 13-14, 23, 28 |
| 1.4.1.7 | Allocate space for collocation (47 CFR §§ 51.323(b), 51.323(f)) | Auinbauh Affidavit, ¶¶ 23-24; Schedule 5 Deere Affidavit, ¶¶ 15-17, 20, 22 |
| 1.4.1.8 | Allow requesting carrier to connect collocated equipment to SWBT's unbundled network elements (47 CFR § 51.323(g)) | Auinbauh Affidavit, ¶¶ 23-24; Schedule 5 Deere Affidavit, ¶¶ 15-17, 22 |
| 1.4.1.9 | Permit two collocating carriers to interconnect equipment at SWBT's premises (47 CFR § 51.323(h)) | Auinbauh Affidavit, ¶ 24; Schedule 5 Deere Affidavit, ¶¶ 15, 20 |
| 1.4.1.10 | Permit subcontracting of physical collocation construction with contractors approved by SWBT, using the same criteria as SWBT in approving its own contractors (47 CFR § 51.323(j)) | Auinbauh Affidavit, Schedule 5 Deere Affidavit, ¶ 21 |
| 1.4.2 | Meet point arrangements (47 CFR § 51.321(b)(2)) | Deere Affidavit, ¶ 31 |
| 1.5 | Provide technical information regarding SWBT's facilities to allow requesting carrier to achieve interconnection (47 CFR § 51.305(g)) | Auinbauh Affidavit, ¶¶ 21-22; Schedules 5-6 |
| 1.6 | Pricing for interconnection is just, reasonable, and nondiscriminatory; is based on cost, and includes a reasonable profit, and is no less favorable than the terms and conditions SWBT applies to itself (Act, §§ 251(c)(2)(D), 252(d)(1); 47 CFR § 51.305(a)(5)) | Auinbauh Affidavit, ¶¶ 7, 36-40 Loehman Affidavit, ¶¶ 9c, e, f, g, 16-32; Schedule G |

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| 2 | UNBUNDLED NETWORK ELEMENTS (Checklist Item (ii)) | |
| | <i>General Provisions for Unbundled Network Elements</i> | |
| 2.1 | Provide to any requesting carrier nondiscriminatory access to network elements (Act. §§ 251(c)(3), 271(c)(2)(B)(ii); 47 CFR § 51.307(a)) | Aunibauh Affidavit, ¶¶ 46 Deere Affidavit, ¶¶ 40-57 Loehman Affidavit, ¶ 9a |
| 2.2 | At any technically feasible point (Act. § 251(c)(3); 47 CFR § 51.307(a)) | Deere Affidavit, ¶¶ 43-44 |
| 2.3 | On rates, terms, and conditions that are just, reasonable, and nondiscriminatory (Act. § 251(c)(3); 47 CFR § 51.307(a)) | Deere Affidavit, ¶¶ 42, 44 Loehman Affidavit, ¶¶ 9f, g |
| 2.4 | Provide network elements in a manner that allows requesting carrier to provide any telecommunications service that may be offered by means of that element (Act. § 251(c)(3); 47 CFR § 51.307(c)) | Deere Affidavit, ¶¶ 42, 44 |
| 2.5 | Access to the facility or functionality of a network element provided separately from access to other elements, and for a separate charge (47 CFR § 51.307(d)) | Deere Affidavit, ¶ 45 |
| 2.6 | Provide technical information regarding SWBT's facilities to enable requesting carrier to achieve access to elements (47 CFR § 51.307(e)) | Deere Affidavit, ¶ 44, 59, 85; Schedule I |
| 2.7 | No limitations, restrictions, or requirements on requests that would impair a requesting carrier's ability to provide a telecommunications service in a manner it intends (47 CFR § 51.309(a)) | Deere Affidavit, ¶¶ 42, 46 |
| 2.8 | Requesting carrier may purchase an unbundled network element to provide exchange access service to itself (47 CFR § 51.309(b)) | Deere Affidavit, ¶ 47 |
| 2.9 | Requesting carrier is entitled to exclusive use of an unbundled network facility for a period of time, and to use of an unbundled feature, function, or capability for a period of time (47 CFR § 51.309(c)) | Deere Affidavit, ¶ 48 |
| 2.10 | SWBT retains duty to maintain, repair, or replace the element (47 CFR § 51.309(c)) | Deere Affidavit, ¶ 48 Kramer Affidavit, ¶¶ 23, 28 |

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| 2.11 | Where technically feasible, quality of the element and access to the element must be at least equal to what SWBT provides itself or any subsidiary, affiliate, or other party (47 CFR §§ 51.311(a), (b)) | Deere Affidavit, ¶¶ 42, 48 |
| 2.12 | Terms and conditions of access to elements offered equally to all requesting carriers (47 CFR § 51.313(a)) | Auinbauh Affidavit, ¶ 46 Deere Affidavit, ¶ 49 Loehman Affidavit, ¶ 33; Schedule H |
| 2.13 | Terms and conditions of access to elements shall be no less favorable than terms and conditions under which SWBT provides such elements to itself (47 CFR § 51.313(b)) | Deere Affidavit, ¶ 48 Loehman Affidavit, ¶ 33; Schedule H |
| 2.14 | Pricing is just, reasonable, and nondiscriminatory, is based on cost, and includes a reasonable profit (Act, § 252(d)(1)) | Loehman Affidavit, ¶¶ 9a, c, f, g, 16-32; Schedule G |
| <i>Combinations of Unbundled Elements (47 CFR § 51.315)</i> | | |
| 2.15 | Unbundled elements provided in a manner that allows requesting carriers to combine them to provide a telecommunications service (47 CFR § 51.315(a)) | Deere Affidavit, ¶¶ 46, 50, 84-113 Loehman Affidavit, ¶ 33; Schedule H |
| <i>Network Interface Device (47 CFR § 51.319(b))</i> | | |
| 2.16 | Requesting carrier can connect its local loops to customer's inside wiring through SWBT's NID and an adjoining NID deployed by requesting carrier (47 CFR § 51.319(b)(2)) | Deere Affidavit, ¶ 51, 53-56 |
| <i>Operations Support Systems</i> | | |
| 2.17 | All required OSS functions made available to purchasers of unbundled elements (47 CFR § 51.313(c)) | Deere Affidavit, ¶ 51 Ham Affidavit, ¶ 6 Kramer Affidavit, ¶¶ 23-25 |
| 2.18 | Pre-ordering and provisioning (47 CFR § 51.319(f)(1)) | Auinbauh Affidavit, Schedule 4 Dysart Affidavit, Pre-Ordering ¶¶ 16-25 Dysart Affidavit, Provisioning ¶¶ 40-66 Ham Affidavit, ¶¶ 25-41 Kramer Affidavit, ¶¶ 13-14 Lowrance Affidavit, ¶ 16 Thorsen Affidavit, pp. 3, 5-8, 14-15 See also § 2.22 below |

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| 2.19 | Ordering (47 CFR § 51.319(f)(1)) | Auinbauh Affidavit, Schedule 4 Dysart Affidavit, ¶¶ 26-39 Ham Affidavit, ¶¶ 42-90; Attachment G Lowrance Affidavit, ¶¶ 14-27, 33-35 Thorsen Affidavit, pp. 7-8, 14-15 |
| 2.20 | Maintenance and repair (47 CFR § 51.319(f)(1)) | Dysart Affidavit, ¶¶ 67-90 Ham Affidavit, ¶¶ 91-106 Kramer Affidavit, ¶¶ 23-31 |
| 2.21 | Billing (47 CFR § 51.319(f)(1)) | Dysart Affidavit, ¶¶ 91-125 Ham Affidavit, ¶¶ 107-118 Lowrance Affidavit, ¶¶ 28-29 |
| <i>Operator Services and Directory Assistance</i> | | |
| 2.22 | Operator services facilities (47 CFR § 51.319(g)) | Auinbauh Affidavit, Schedule 4 Deere Affidavit, ¶ 51 Dysart Affidavit, ¶¶ 126-134 Keener Affidavit, ¶ 13 |
| 2.23 | Directory Assistance facilities (47 CFR § 51.319(g)) | Dysart Affidavit, ¶¶ 126-134 Keener Affidavit, ¶¶ 7-12 |
| 2.24 | Access provided where technically feasible (47 CFR § 51.319(g)) | Deere Affidavit, ¶¶ 51, 58-59, 77, 79 |
| <i>Further Unbundling</i> | | |
| 2.25 | Unbundling of additional elements where technically feasible in accordance with 47 CFR § 51.317 | Deere Affidavit, ¶ 58 |
| 3 | POLES, DUCTS, CONDUITS, AND RIGHTS OF WAY (Checklist Item (iii)) | |
| 3.1 | Provide nondiscriminatory access on same basis as provided to SWBT, its affiliates, or any other person at just and reasonable rates in accordance with the requirements of Section 224 of the Act (Act, §§ 224, 251(b)(4), 271(c)(2)(B)(iii), 47 CFR § 1.1403(a)) | Auinbauh Affidavit, Schedule 4 Hearst Affidavit, ¶¶ 36-40 |
| 3.2 | Costs of modifications allocated in accordance with 47 CFR § 1.141b | Hearst Affidavit, ¶ 32 |

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| 4 | UNBUNDLED LOOPS (Checklist Item (iv)) | |
| 4.1 | Transmission facility between an MDF or equivalent facility in SWBT's central office and end-user premises (47 CFR § 51.319(a)) | Auinbau Affidavit, Schedule 14 Deere Affidavit, ¶¶ 51, 62, 202-204 |
| 4.2 | Pricing is just, reasonable, and nondiscriminatory, is based on cost, and includes a reasonable profit (Act, § 252(d)(1)) | Loehman Affidavit, ¶¶ 9a, c, f, g, 16-32; Schedule G |
| 5 | UNBUNDLED TRANSPORT (Checklist Item (v)) | |
| 5.1 | Dedicated transport or entrance facilities or shared transport facilities providing telecommunications service between wire centers or switches owned by SWBT or requesting carrier; from trunk side of switch unbundled from switching or other services (47 CFR § 51.319(d)(1)) | Deere Affidavit, ¶¶ 66-73 |
| 5.2 | Exclusive use of interoffice transmission facilities dedicated to a particular customer or carrier (47 CFR § 51.319(d)(1)) | Deere Affidavit, ¶¶ 66-73 |
| 5.3 | Provide all technically feasible transmission facilities, features, functions, and capabilities that requesting carrier could use to provide telecommunications services (47 CFR § 51.319(d)(2)(ii)) | Deere Affidavit, ¶¶ 66-73, 107-113 |
| 5.4 | Permit, as technically feasible, requesting carrier to connect interoffice facilities to equipment it designates, including its collocated facilities (47 CFR § 51.319(d)(2)(iii)) | Deere Affidavit, ¶¶ 66-68, 74 |
| 5.5 | Permit requesting carrier to obtain functionality of SWBT's DCS systems in same manner as interexchange carriers (47 CFR § 51.319(d)(2)(iv)) | Deere Affidavit, ¶ 71 |
| 5.6 | Pricing is just, reasonable, and nondiscriminatory, is based on cost, and includes a reasonable profit (Act, § 252(d)(1)) | Loehman Affidavit, ¶¶ 9a, c, f, g, 16-32; Schedule G |
| 6 | LOCAL AND TANDEM SWITCHING (Checklist Item (vi)) | |
| 6.1 | Local switching capability (Act, § 271(c)(2)(B)(vi); 47 CFR § 51.319(c)(1)) | Auinbau Affidavit, Schedule 4 Deere Affidavit, ¶ 74 |

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| 6.1.1 | Line-side facilities (47 CFR § 51.319(c)(1)(i)(A)) | Deere Affidavit, ¶¶ 74-83 |
| 6.1.2 | Trunk-side facilities (47 CFR § 51.319(c)(1)(i)(B)) | Deere Affidavit, ¶¶ 74-83 |
| 6.1.3 | All features, functions, and capabilities of the switch (47 CFR § 51.319(c)(1)(i)(C)) including: | Deere Affidavit, ¶ 77 |
| 6.1.3.1 | Basic switching function and capabilities (47 CFR § 51.319(c)(1)(i)(C)(1)) | Deere Affidavit, ¶ 77 |
| 6.1.3.2 | All other features switch is capable of providing, including custom calling, CLASS, Centrex, and any technically feasible customized routing functions (47 CFR § 51.319(c)(1)(i)(C)(2)) | Deere Affidavit, ¶¶ 77, 83 |
| 6.1.4 | SWBT will transfer customer's local service in same interval it transfers customers between IXCs, if transfer requires only a software change (47 CFR § 51.319(c)(ii)) | Deere Affidavit, ¶ 180 |
| 6.2 | Tandem switching capability (47 CFR § 51.319(c)(2)) | Deere Affidavit, ¶¶ 74-76, 79, 82, 85, 87 |
| 6.2.1 | Trunk-connect facilities (47 CFR § 51.319(c)(2)(i)) | Deere Affidavit, ¶ 82 |
| 6.2.2 | Trunk-to-trunk switching function (47 CFR § 51.319(c)(2)(ii)) | Deere Affidavit, ¶¶ 74, 82 |
| 6.2.3 | Functions centralized in tandem switches, including call recording, routing to operator services, and signaling conversion features (47 CFR § 51.319(c)(2)(iii)) | Deere Affidavit, ¶¶ 77, 82 |
| 6.3 | Pricing is just, reasonable, and nondiscriminatory, is based on cost, and includes a reasonable profit (Act, § 252(d)(1)) | Loehman Affidavit, ¶¶ 9a, c, f, g, 16-32; Schedule G |
| 7 | ACCESS TO 911 AND E911 SERVICES, OPERATOR CALL COMPLETION SERVICE, AND DIRECTORY ASSISTANCE (Checklist Item (vii)) | |
| 7.1 | 911 and E911 services (Act, § 271(c)(2)(B)(vii)(I)) | Aunbauh Affidavit, Schedule 4 Deere Affidavit, ¶¶ 77, 114-131 Dysart Affidavit, ¶¶ 155-160 |
| 7.2 | Operator call completion services (Act, § 271(c)(2)(B)(vii)(II)) | Keener Affidavit, ¶¶ 4, 13-16 |

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| 7.2.1 | Nondiscriminatory rates, terms, and conditions for all carriers (47 CFR § 51.217(a)(2)(i)) | Keener Affidavit, ¶¶ 4, 9-10, 15 |
| 7.2.2 | With quality that is at least equal to that of SWBT (47 CFR § 51.217(a)(2)(ii)) | Deere Affidavit, ¶¶ 114-116 Keener Affidavit, ¶ 15 |
| 7.2.3 | With no unreasonable dialing delays (47 CFR § 51.217(b)) | Keener Affidavit, ¶ 16 |
| 7.2.4 | Accessible by dialing 0 or 0-, regardless of local service provider (47 CFR § 51.217(c)(2)) | Deere Affidavit, ¶¶ 174-177 Keener Affidavit, ¶¶ 13-14 |
| 7.2.5 | Make available in their entirety and provide access to all adjunct services (47 CFR § 51.217(c)(3)(iv)) | Keener Affidavit, ¶¶ 13-16 |
| 7.2.6 | Provide branding, or provide service without SWBT branding, upon request (47 CFR § 51.217(d)) | Keener Affidavit, ¶¶ 9, 17-21 |
| 7.3 | <i>Directory assistance services (Act, § 271(c)(2)(B)(vii)(II))</i> | Keener Affidavit, ¶¶ 7-12 |
| 7.3.1 | Nondiscriminatory rates, terms, and conditions for all carriers (47 CFR § 51.217(a)(2)(i)) | Keener Affidavit, ¶ 9 |
| 7.3.2 | With quality that is at least equal to that of SWBT (47 CFR § 51.217(a)(2)(ii)) | Keener Affidavit, ¶ 9 |
| 7.3.3 | With no unreasonable dialing delays (47 CFR § 51.217(b)) | Keener Affidavit, ¶ 10 |
| 7.3.4 | Any customer of a competing provider can obtain directory listings, except unlisted numbers, for customers of any carrier on a nondiscriminatory basis (47 CFR §§ 51.217(c)(3)(i), 51.217(c)(3)(iii)) | Keener Affidavit, ¶¶ 11-12 |
| 7.3.5 | Directory listings provided to competing provider in readily accessible magnetic tape or electronic formats in a timely fashion (47 CFR § 51.217(c)(3)(iii)) | Keener Affidavit, ¶¶ 11-12 |
| 7.3.6 | Competing providers have access to and may read information in SWBT's directory assistance databases (47 CFR § 51.217(c)(3)(iii)) | Deere Affidavit, ¶¶ 119, 131 Keener Affidavit, ¶¶ 11-12 |
| 7.3.7 | Make available in their entirety and provide access to all adjunct services (47 CFR § 51.217(c)(3)(iv)) | Keener Affidavit, ¶ 9 |
| 7.3.8 | Provide branding, or provide service without SWBT branding, upon request (47 CFR § 51.217(d)) | Keener Affidavit, ¶¶ 9, 17-21 |

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| 8 | WHITE PAGES (Checklist Item (viii)) | |
| 8.1 | White pages directory listing for customers of other carrier's local exchange service (Act. § 271(c)(2)(B)(viii); 47 CFR § 51.319(c)(1)(i)(C)(1)) | Auinbauh Affidavit, ¶¶ 49-58; Schedule 4 |
| 9 | ACCESS TO TELEPHONE NUMBERS (Checklist Item (ix)) | |
| 9.1 | Nondiscriminatory access until the date numbering administration guidelines, plan, or rules are established (Act. § 271(c)(2)(B)(ix)); 47 CFR §§ 51.217(a)(2), 51.319(c)(1)(i)(C)(1)) | Adair Affidavit, generally Auinbauh Affidavit, Schedule 4 |
| 9.2 | After that date, compliance with such guidelines, plan, or rules (Act. § 271(c)(2)(B)(ix)) | Adair Affidavit, ¶ 22 |
| 9.3 | Access at least equal to what SWBT provides itself (47 CFR § 51.217(c)(1)) | Adair Affidavit, ¶ 10-18 |
| 10 | ACCESS TO SIGNALING AND CALL-RELATED DATABASES (Checklist Item (x)) | |
| 10.1 | Signaling Networks (47 CFR § 51.319(e)(1)) | Deere Affidavit, ¶¶ 132, 134 |
| 10.1.1 | Signaling links (47 CFR § 51.319(e)(1)(i)) | Deere Affidavit, ¶ 133 |
| 10.1.2 | Signaling transfer points (47 CFR § 51.319(e)(1)(i)) | Deere Affidavit, ¶¶ 133, 135 |
| 10.1.3 | For carriers purchasing unbundling switching capability, access to SWBT's signaling network in same manner as SWBT (47 CFR § 51.319(e)(1)(ii)) | Deere Affidavit, ¶¶ 132-134, 136, 154-155 |
| 10.1.4 | For requesting carriers with their own switching facilities, access to SWBT's signaling for each of carrier's switches in same manner as SWBT connects its switches to an STP (47 CFR § 51.319(e)(1)(iii)) | Deere Affidavit, ¶¶ 134, 142, 149 |
| 10.2 | Call-related databases (47 CFR § 51.319(e)(2)) | Deere Affidavit, ¶¶ 132, 136, 154-155 |
| 10.2.1 | Line information database (47 CFR § 51.319(e)(2)(i)) | Deere Affidavit, ¶¶ 137-143 |
| 10.2.2 | Toll-free calling database (47 CFR § 51.319(e)(2)(ii)) | Deere Affidavit, ¶¶ 145-152 |
| 10.2.3 | Downstream number portability database (47 CFR § 51.319(e)(2)(iii)) | Deere Affidavit, ¶¶ 170, 172-173 Fleming Affidavit, ¶¶ 10-11, 16, 22 |

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| 10.2.4 | AIN databases (47 CFR § 51.319(e)(2)(ii)) | Deere Affidavit, ¶¶ 132, 136, 151-152 |
| 10.2.5 | Physical access at the STP linked to the unbundled database (47 CFR § 51.319(e)(2)(ii)) | Deere Affidavit, ¶¶ 133, 135, 142 |
| 10.2.6 | Carriers purchasing local switching capability may access SWBT's service control point in same manner as SWBT (47 CFR § 51.319(e)(2)(iii)) | Deere Affidavit, ¶ 134, 141-142, 151 |
| 10.2.7 | Carrier deploying own switch given access to SWBT's service control point in manner allowing carrier to provide any call-related, database-supported services (47 CFR § 51.319(e)(2)(iv)) | Deere Affidavit, ¶¶ 138, 141-142 |
| 10.2.8 | Access to call-related databases complies with privacy provisions of § 222 of the Act (47 CFR § 51.319(e)(2)(vi)) | Deere Affidavit, ¶¶ 140, 153 |
| 10.3 | Service Management Systems (47 CFR § 51.319(e)(3)) | Deere Affidavit, ¶ 152 |
| 10.3.1 | Interconnects to the service control point and sends information and call processing instructions to service control point and provides requesting carriers with call-processing capabilities (47 CFR § 51.319(e)(3) (I)(A),(B)) | Deere Affidavit, ¶¶ 132, 141-142, 151 |
| 10.3.2 | Requesting carrier given information necessary to enter correctly, or format for entry, information for input into SMS (47 CFR § 51.319(e)(3)(ii)) | Deere Affidavit, ¶ 152 |
| 10.3.3 | Requesting carrier allowed same access as SWBT to develop AIN-based services via SMS (47 CFR § 51.319(e)(3)(iii)) | Deere Affidavit, ¶¶ 151-152 |
| 10.3.4 | Access to SMS complies with privacy provisions of § 222 of the Act (47 CFR § 51.319(e)(3)(v)) | Deere Affidavit, ¶ 153 |
| 11 | NUMBER PORTABILITY ((Checklist Item (xi)) | |
| 11.1 | Provide interim number portability through RCF, DID or other comparable arrangements (Act, § 271(c)(2)(B)(xi), 47 CFR §§ 51.203, 52.27) | Auinbauh Affidavit, ¶¶ 59-74; Schedule 4 Deere Affidavit, ¶¶ 156, 158, 170-171 Kramer Affidavit, ¶¶ 16-22 Loehman Affidavit, ¶ 9d Lowrance Affidavit, ¶¶ 39-45 |
| 11.2 | Any other comparable and technically feasible method upon request, as soon as reasonably possible (Act, § 271(c)(2)(B)(xi)) | Deere Affidavit, ¶¶ 170-171 |

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| 11.3 | Competitively neutral cost recovery mechanism (47 CFR §§ 52.29, 52.29(a)) | Deere Affidavit, ¶ 172 |
| 11.4 | After regulations are issued, full compliance with performance criteria and schedules for implementation of long-term database method (Act, § 271(c)(2)(B)(xi); 47 CFR § 52.23) | Auinbauh Affidavit, ¶¶ 59-61 Fleming Affidavit, ¶¶ 8-16, 18-22; Appendices A, C |
| 12 | LOCAL DIALING PARITY (Checklist Item (xii)) | |
| 12.1 | Provide requesting carriers with services and information necessary to implement local dialing parity in accordance with Act, § 251(b)(3) | Deere Affidavit, ¶¶ 174-177 |
| 12.2 | Nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listings with no unreasonable dialing delays (Act, § 251(b)(3)) | Deere Affidavit, ¶¶ 174-177 |
| 12.3 | Ensure the same number of digits to dial a call regardless of the originating or terminating carrier (47 CFR §§ 51.205, 51.207) | Deere Affidavit, ¶¶ 174-177 |
| 13 | RECIPROCAL COMPENSATION (Checklist Item (xiii)) | |
| 13.1 | Establish reciprocal compensation arrangements for transport and termination of local telecommunications traffic with requesting carrier (Act §§ 251(b)(5), 252(d)(2), 271(c)(2)(b)) | Auinbauh Affidavit, ¶¶ 75-84 |
| 13.2 | Either provide for the mutual and reciprocal recovery by each carrier of costs associated with transport and termination of calls that originate on the network facilities of the other carrier (Act § 252(d)(2)(A)(i)) | Auinbauh Affidavit, ¶¶ 75-84 |
| 13.2.1 | Charges based on reasonable approximation of the additional cost of terminating such calls (Act § 252(d)(2)(A)(ii)) | Auinbauh Affidavit, ¶¶ 75-84 Loehman Affidavit, ¶¶ 9f, g, 26-32 |
| 13.3 | Or no charge for local traffic by party on whose network call originates (Act § 252(d)(2)(B)(i)) | See § 13.2 above |
| 14 | RESALE (Checklist Item (xiv)) | |
| 14.1 | Provide at wholesale rates any telecommunications service provided at retail to subscribers who are not telecommunications carriers (Act, § 251(c)(4)(A)) | Loehman Affidavit, ¶ 36 |